

# Exhibit A

## **Documents and Information to be Produced Pursuant to this DMCA Subpoena**

For the period January 1, 2020 through the present, produce all documents<sup>1</sup>, account records, and any other information that identify the person(s) or entities that caused the infringement of the material described in the attached Exhibit B “Notifications of Copyright Infringements issued pursuant to 17 U.S.C. § 512(c)(3) to Registered DMCA Agent for Service Provider Cloudflare, Inc; and/or operator and/or owner who unlawfully uploaded and/or facilitated PCR Distributing, Co.’s copyrighted works at the URLs listed in the notifications, including but not limited to identification by names, email addresses, IP addresses, user history, posting history, physical addresses, telephone numbers, billing information, billing history, and any other identifying information.

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<sup>1</sup> Definitions. The term "document" as used herein, means any and all materials falling within subparagraphs (1) through (4) of Rule 1001, Federal Rules of Evidence, including without limitation computer logs, summaries, account records, invoices, receipts, spreadsheets, charts, reports, agreements, correspondence, facsimile messages, electronic mail, memoranda, notes, data, notations, reports and records of any communications (including telephone or other conversations, interviews, conferences or committee or other meetings), letters, affidavits, statements, plans, specifications, contracts, licenses, photographs, objects, tangible things, journals, books or other records of accounts, summaries of accounts, balance sheets, income statements, bills, lists, tabulations, graphs, recordings, computer records and all other records kept by electronic, photographic or mechanical means, and things similar to any of the foregoing, however denominated.